

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
NECA-IBEW HEALTH & WELFARE FUND,	:	Civil Action No. 1:08-cv-10783-LAP
Individually and On Behalf of All Others	:	
Similarly Situated,	:	"ECF Case"
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	
	:	
GOLDMAN, SACHS & CO., et al.,	:	
	:	
Defendants.	:	
<hr/>		X
POLICE AND FIRE RETIREMENT SYSTEM:	:	Civil Action No. 10 Civ. 4429-LAP
OF THE CITY OF DETROIT, Individually	:	
and On Behalf of All Others Similarly Situated,	:	"ECF Case"
	:	
Plaintiff,	:	CLASS ACTION
	:	
vs.	:	
	:	
GOLDMAN, SACHS & CO., et al.,	:	
	:	
Defendants.	:	
<hr/>		:X

PLAINTIFFS' COUNSEL'S NOTICE OF MOTION AND MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND EXPENSES

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that counsel for NECA-IBEW Health & Welfare Fund and Police and Fire Retirement System of the City of Detroit ("Plaintiffs' Counsel"), will move this Court on April 13, 2016, at 10:00 a.m., before the Honorable Loretta A. Preska, for entry of an order, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure, awarding attorneys' fees and litigation expenses incurred in prosecuting the litigation. This motion is based on: (i) the Memorandum of Law in Support of Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees and Expenses; (ii) the Declaration of Arthur C. Leahy in Support of (1) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation and (2) Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees and Expenses; (iii) the Declaration of Carole K. Sylvester; (iv) the Declarations of Plaintiffs' Counsel; (v) the Stipulation and Agreement of Settlement, dated as of August 12, 2015; and (vi) all other proceedings herein.

A proposed order will be submitted with Plaintiffs' Counsel's reply submission on or before March 21, 2016.

DATED: February 18, 2016

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ARTHUR C. LEAHY
THEODORE J. PINTAR
LUCAS F. OLTS

s/ Arthur C. Leahy
ARTHUR C. LEAHY

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
drosefeld@rgrdlaw.com

Lead Counsel for Plaintiff NECA-IBEW Health &
Welfare Fund

CAVANAGH & O'HARA
PATRICK J. O'HARA
407 East Adams Street
Springfield, IL 62701
Telephone: 217/544-1771
217/544-9894 (fax)

Additional Counsel for Plaintiff NECA-IBEW
Health & Welfare Fund

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ, LLP
LAWRENCE P. KOLKER
MICHAEL LISKOW

s/ Lawrence P. Kolker
LAWRENCE P. KOLKER

270 Madison Avenue
New York, New York 10016
Telephone: 212/545-4600
212/545-4653 (fax)

Counsel for Plaintiff The Police and Fire
Retirement System of the City of Detroit

KOHN, SWIFT & GRAF, P.C.
JOSEPH C. KOHN
DENIS F. SHEILS
WILLIAM E. HOESE
BARBARA L. GIBSON

s/ Denis F. Sheils

DENIS F. SHEILS

One South Broad Street
Suite 2100
Philadelphia, PA 19107-3389
Telephone: 215/238-1700
215/238-1968 (fax)

Counsel for Plaintiff The Police and Fire
Retirement System of the City of Detroit

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2016, I caused the foregoing Plaintiffs' Counsel's Notice of Motion and Motion for an Award of Attorneys' Fees and Expenses to be served electronically on all ECF participants.

s/ Arthur C. Leahy

ARTHUR C. LEAHY